

DOCKET	
06-SPPE-2	
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December 13, 2006

Mary Dyas
Project Manager
California Energy Commission
1516 9th Street
Sacramento, CA 95814-5504

Subject: Imperial Irrigation District's Comments on the California Energy Commission's Final Initial Study for the El Centro Unit 3 Repower Project

Dear Ms. Dyas:

On behalf of Imperial Irrigation District (IID or Applicant), URS Corporation (URS) would like to submit comments on the Final Initial Study (FIS), dated November 30, 2006. IID has reviewed the California Energy Commission's (CEC) FIS for the El Centro Unit 3 Repower Project. We believe that our comments help to clarify a few of the Conditions of Exemption within the FIS. Applicant's comments are in the areas of Waste Management and General Conditions of Exemption.

WASTE MANAGEMENT

Condition of Exemption WASTE-4 directs the Applicant to "ensure that a specific protocol for handling contaminated groundwater that may be produced during construction dewatering is included in the NPDES permit for the project." Since it is not known at this time whether or not the water generated during the construction or excavation of the footings and foundation will require disposal or simply discharging, the Applicant would like to provide for this unknown condition by requiring the Applicant to develop a plan for handling water generated during excavation. The Applicant proposes the following modification to this Condition of Exemption:

WASTE-4 The project owner shall ensure that a specific protocol for handling contaminated groundwater that may be produced during construction dewatering is ~~included in the NPDES permit~~ developed for the project prior to construction.

Verification: At least 30 days prior to the start of project site grading, the project owner shall provide the Energy Commission CPM verification from the CRBRWQCB that a plan has been approved the NPDES permit for the project includes outlining a specific protocol for handling contaminated water produced during project construction.

GENERAL CONDITIONS

Within the General Conditions of the FIS, the CEC has outlined the process for making project changes after the FIS has been approved. The Applicant would like to propose changing this language so that it is consistent with a Small Power Plant Exemption versus a standard Application for Certification process. The Applicant would propose the following changes:



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On page 19-6, change the heading "Post Certification Changes to the Energy Commission Decision" to "Post Exemption Changes to the Energy Commission Decision."

On that same page, the Applicant proposes the following changes to the first sentence under the heading described above:

~~For the life of the project~~ During project development, IID must provide written notification to the CPM when planning changes to the project description.

This change would make the General Conditions consistent with the language under the heading "Staff Analysis" on page 1-1 of the FIS: "In addition, staff will adopt a reporting or monitoring program designed to ensure compliance during project development and to avoid significant impacts or the need for further mitigation."

IID would be happy to discuss these comments with you further if necessary prior to the Prehearing Conference scheduled for December 19, 2006. Otherwise, IID assumes that the CEC and CEC staff do not have any objections to the suggested modifications addressed above.

Sincerely,

URS Corporation

A handwritten signature in black ink, appearing to read "James Diven", is positioned above the printed name.

James Diven
URS Project Manager

cc: Henryk Olstowski, IID
Jim Turner, IID
Dana Diller
Dave Tateosian, PEI
Allan Thompson, Project Counsel



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EL CENTRO REPOWER PROJECT
SMALL POWER PLANT EXEMPTION
DOCKET NO. 06-SPPE-2

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I declare that I transmitted the foregoing document via e-mail, or as indicated by first class postal mail, to the above named on the date indicated thereby. I declare under penalty of perjury that the foregoing is true and correct.

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